

Entered -1-11-00 - sb  
CL 00L0001 - GWENDOLYN BURNS

CLAIM OF:

**DEBORA L. CREECH**  
through her attorney  
**Chaundra D. Lewis, Esq.**  
**LEWIS MCCRAY, LLP**  
1401 Peachtree Street, NE, Suite 500  
Atlanta, Georgia 30309

For damages alleged to have been sustained from discriminatory treatment while employed with the City from 1983 through November, 1999 at 675 Ponce de Leon Avenue, NE.

THIS ADVERSED REPORT IS  
APPROVED

BY: \_\_\_\_\_

  
ROBERT N. GODFREY  
DEPUTY CITY ATTORNEY

DEPARTMENT OF LAW - CLAIM INVESTIGATION SUMMARY

Claim No. 00L0001

Date: December 27, 2000

Claimant /Victim DEBORA L. CREECH  
BY: (Atty) (Ins. Co.) Chaundra D. Lewis, LEWIS MCCRAY, LLP  
Address: 1401 Peachtree Street, Suite 500, Atlanta, Georgia 30309  
Subrogation: Claim for damage \$ unspecified Bodily Injury \$             
Date of Notice: 12/6/99 Method: Written, Proper X Improper             
Conforms to Notice: O.C.G.A. §36-33-5 X Ante Litem (6 Mo.) X  
Date of Occurrence 1983 - 11/99 Place: 675 Ponce de Leon Avenue, NE  
Department FIRE Division             
Employee involved            Disciplinary Action:           

NATURE OF CLAIM: The claimant alleges that she encountered discriminatory treatment during employment with the Fire Department. However, claims involving allegations of violations of Title VII should not be investigated by the Claims Division as these claims are within the purview of the Affirmative Action Division of the Bureau of Labor Relations.

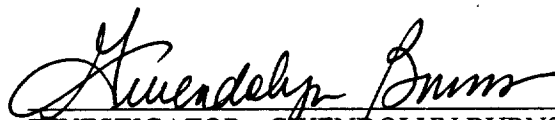
INVESTIGATION:

Statements: City employee            Claimant            Others            Written            Oral             
Pictures            Diagrams            Reports: Police            Dept Report            Other X  
Traffic citations issued: City Driver            Claimant Driver             
Citation disposition: City Driver            Claimant Driver           

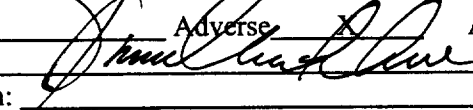
BASIS OF RECOMMENDATION:

Function: Governmental X Ministerial             
Improper Notice            More than Six Months            Other X Damages reasonable             
City not involved            Offer rejected            Compromise settlement             
Repair/replacement by Ins. Co.            Repair/replacement by City Forces             
Claimant Negligent            City Negligent            Joint            Claim Abandoned           

Respectfully submitted,

  
INVESTIGATOR - GWENDOLYN BURNS

RECOMMENDATION:

Pay \$            Adverse X Account charged: 1A01            2J01            2H01             
Claims Manager:  Concur/date 12-27-00  
Committee Action:            Council Action

**LEWIS MCCRAY, LLP**

A LIMITED LIABILITY PARTNERSHIP  
ATTORNEYS AT LAW

Reeves  
12/14/99  
DR

December 2, 1999

ENTERED - 1-11-00 - SB  
00L0001 - MIKE REEVES

Via Certified Mail - Return Receipt Requested

Honorable Mayor Bill Campbell  
City of Atlanta  
Law Department  
68 Mitchell Street, SW  
Atlanta, Georgia 30335-0332

Mr. Winston Minor, Fire Chief  
City of Atlanta Fire Department  
City Hall East  
675 Ponce de Leon Avenue, NE  
Suite 2001  
Atlanta, Georgia 30308-1807

**Re: Debora L. Creech  
Ante- Litem Notice**

**ANTE LITEM NOTICE AND  
REQUEST FOR INSURANCE INFORMATION**

Dear Sirs:

Please be advised that this office represents Ms. Debora L. Creech for all claims arising out of discriminatory treatment encountered during her employment with the City of Atlanta Fire Department. This letter is intended to place you on formal notice, pursuant to O.C.G.A. §36-33-5, of any claims that our client may have as a result of her employment with the Fire Department.

The discriminatory acts giving rise to Ms. Creech's complaint, dating from 1983 until November 1999, included such things as unsubstantiated transfers, derogatory comments, inability to fill in at fire stations due to lack of female accommodations, refusal of a training position without using the proper chain of command, denial of leave under the Family Medical Leave Act, and fabrication of an event leading to her current leave. This series of events led to physical and mental injuries for Ms. Creech.

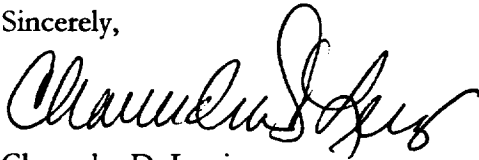
In addition to placing you on formal notice, this letter is also to request, pursuant to O.C.G.A. §33-3-28, "a statement, under oath, of a corporate officer or the insurer's claims manager stating with regard to each known policy of insurance issued by it, including excess or umbrella insurance, the name of the insurer, the name of each insured, and the limits of coverage." You may provide a copy of the declaration page in lieu of providing such information.

Please inform me immediately of any reservation of rights and/or conditions of your policy which you may assert as a defense with regard to the above-referenced incident.

Honorable Mayor Bill Campbell  
Mr. Winston Minor  
December 2, 1999  
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If you have any questions, or need additional information, please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chaundra D. Lewis".

Chaundra D. Lewis  
Attorney at Law

CDL/anm

0-36

01-R-0044